

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

v.

DANIEL BYRD

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CRIMINAL NO. 4:23-cr-00165-1

DEFENDANT'S UNOPPOSED MOTION FOR CONTINUANCE

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Daniel Byrd, who respectfully requests this Honorable Court to enter an order continuing this cause and in support thereof would show as follows:

1. The United States Government is unopposed to this motion.
2. The Probation officer unopposed to this motion.
3. The Defendant is seeking a 7-day extension on the objections deadline for the PSI.
4. The case currently has a scheduled PSI Objection deadline on February 10, 2025.
5. The PSI contained evidence that the Defense Counsel wanted to review and counsel and the agent for the Government have not yet had time to meet to review the relevant evidence from the PSI. This meeting should be held next week.
6. The Defendant has filed a waiver for a speedy trial.
7. This motion is not made for delay.

WHEREFORE, PREMISES CONSIDERED, Defendant requests that this Honorable Court grant this motion and reset the PSI Objection deadline for 7 days or whichever date this Honorable Court sees fit. Defendant acknowledges that remaining deadlines should remain.

Respectfully submitted,

PAUL DOYLE & ASSOCIATES, P.C.

By: /s/ Paul Doyle

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 7th day of February 2025, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all counsel of record.

/s/ Paul Doyle

Paul Doyle

Attorney for Daniel Byrd

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that on the 7th day of February 2025, counsel spoke the assigned, Assistant United States Attorney, stating that he was unopposed to this motion.

/s/ Trevor Sharon

Trevor Sharon

Attorney for Daniel Byrd